

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PFLAG, INC., *et al.*,
Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*,

Defendants.

Civil Action No. 8:25-cv-337-BAH

MOTION TO STAY INJUNCTION PENDING APPEAL

Pursuant to Federal Rule of Civil Procedure 62, Defendants respectfully move for a stay pending appeal of the Court’s March 4, 2025 Order, ECF No. 116, which preliminarily enjoins Defendants on a nationwide basis “from conditioning, withholding, or terminating federal funding under Section 3(g) of Executive Order No. 14,168 *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government*, 90 Fed. Reg. 8615 (Jan. 30, 2025) and Section 4 of Executive Order No. 14,187, *Protecting Children from Chemical and Surgical Mutilation*, 90 Fed. Reg. 8771 (Feb. 3, 2025) based on the fact that a healthcare entity or health professional provides gender-affirming medical care to a patient under the age of nineteen.” Order at 1-2 ECF. No. 116. Defendants request that the Court stay its preliminary injunction pending appeal. In the alternative, at minimum, the Court should stay its preliminary injunction to the extent it extends beyond the named plaintiffs and those members of the organizations who have submitted declarations establishing their standing. The reasons for this motion are set forth in the accompanying memorandum.

Dated: July 28, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

MICHELLE BENNETT
Assistant Branch Director

/s/ Robert C. Bombard
ROBERT C. BOMBARD
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20530
Tel.: (202) 616-0773
robert.bombard2@usdoj.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed using the Court's CM/ECF system. Service was effected by and through the Court's CM/ECF system.

Dated: July 28, 2025

/s/ Robert C. Bombard
Robert C. Bombard